



MEMO ENDORSED

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March 20, 2020

VIA ECF

USDC SDNY
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ELECTRONICALLY FILED
DOC # _____
DATE FILED: March 20, 2020

Hon. Edgardo Ramos
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Tucker v. Chick-Fil-A, Inc., Civil Action No. 1:19-cv-09844-ER
Civil Action No. 1:19-cv-09844-ER

Dear Judge Ramos:

This Firm represents Defendant Chick-Fil-A, Inc. ("Defendant") in the above-referenced matter. We have conferred with Plaintiff's counsel and write, with Plaintiff's concurrence, to jointly request a stay of this action until August 20, 2020.

By way of background, the current deadline for Defendant respond to the Complaint is April 3, 2020. (ECF No. 13.) Defendant anticipates filing a letter on or before this date requesting a pre-motion conference in connection with its anticipated Motion to Dismiss.

The parties respectfully request that this action be stayed to allow for the resolution of motions to dismiss in similar matters arising out of alleged violations of Title III of the Americans with Disabilities Act based on gift cards that do not include Braille, which are currently pending before the Court and other judges in this District and the Eastern District of New York. The stay would allow the parties to have the benefit of the Court's analysis of the issues in other matters, which will inform their assessment of the pending case. It will also conserve resources of both the parties and the Court. Similar stays were recently granted on the same grounds, for example, by the Court in *Dominguez v. Marshalls of MA, Inc.*, Case No. 1:19-cv-10626 (S.D.N.Y.) (ECF No. 20), by Judge Woods in *Calcano v. Domino's Pizza, Inc.*, Case No. 1:19-cv-09823-GHW (S.D.N.Y.) (ECF No. 24) and *Delacruz v. Jamba Juice*, Case No. 1:19-cv-10321-GHW (S.D.N.Y.) (ECF No. 20), by Judge Abrams in *Delacruz v. Five Below, Inc.*, Case No. 19-cv-10294-RA (S.D.N.Y.) (ECF No. 16), *Mendez v. The Men's Wearhouse, Inc.*, Case No. 1:19-cv-11765-RA (S.D.N.Y.) (ECF No. 15), and *Matzura v. New Balance Athletics, Inc.*, Case No. 1:19-cv-11344-RA (S.D.N.Y.) (ECF No. 18), by Judge Failla in *Calcano v. Guess ?, Inc.*, Case No. 1:19-cv-10441-KPF (S.D.N.Y.) (ECF No. 18), by Judge



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Caproni in *Calcano v. Drybar Holdings LLC*, Case No. 1:19-cv-11389-VEC (S.D.N.Y.) (ECF No. 10), by Judge Daniels in *Delacruz v. Converse, Inc.*, Case No. 1:19-cv-10293-GBD (S.D.N.Y.) (ECF No. 20), by Judge Liman in *Mendez v. Jos. A. Bank*, Case No. 1:19-cv-11756-LJL (S.D.N.Y.) (ECF No. 16), and by Magistrate Judge Cave in *Matzura v. Eddie Bauer LLC*, Civil Action No. 1:10-cv-10143-LTS-SLC (S.D.N.Y.) (ECF No. 25). These orders are enclosed for the Court's convenience.

We thank the Court for its time and attention to this matter, and for its consideration of this application.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

Enclosure

cc: All counsel of record (via ECF)

The application is granted. This action is STAYED until August 20, 2020. The parties are directed to file a status update on or by August 21, 2020.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos'.

Edgardo Ramos, U.S.D.J

Dated: March 20, 2020

New York, New York